

October 20, 2016

Executive Secretary
Iowa Utilities Board
1375 E. Court Avenue, Room 69
Des Moines, IA 50319-0069

Re: Docket No. TF-2016-0321

Dear Members of the Iowa Utilities Board,

The Clayton County Energy District is incorporated under Iowa law as a non-profit dedicated to a locally-led and locally-owned clean energy transition. Our work rests on the twin pillars of local wealth creation and retention (economic development), and climate stewardship for future generations. Our Board includes individuals from the agricultural, banking, business, health, environmental, legislative and other sectors.

We have been rapidly learning about distributed generation issues, and following the Distributed Generation docket NOI-2014-0001. Clayton County is served largely by Alliant/IPL and Allamakee/Clayton Electric Cooperative, both of which have offered retail net metering in recent years. Customer ownership of solar is of growing interest in our county, and earlier this year over 85 farmers, business and homeowners attended a solar workshop we held near Elkader.

Recently we learned that Alliant/IPL has proposed major changes to the existing net metering tariff in docket TF-2016-321 that do not appear consistent with the Board's order directing both Alliant/IPL and MidAmerican to make specific yet limited changes to the tariffs for a 3-year period. We sincerely appreciate the Board's careful deliberation of this issue for the past three years, and the apparent recognition that at least for the time being in Iowa, retail net metering does represent a very close approximation of "fair trade" between utility and DG customer. In this spirit, we respectfully request that the Board:

1. Direct Alliant/IPL to revise their proposed net billing tariff to follow the letter and spirit of the Board's Order and of MidAmerican's proposed net billing tariff. It is critically important we have one uniform net metering tariff in Iowa for clarity and consistency, and to avoid widespread confusion between IOU customers.
2. Ensure that Alliant/IPL's tariff does not artificially limit DG system sizes eligible for net metering/billing. The annual cash-out at avoided cost would already address any issues of system oversizing. Alliant/IPL's definition of "customer load" is not consistent with general understanding of annual energy usage commonly related to net metering. Alliant/IPL's proposed tariff should be consistent with MidAmerican's proposed tariff in defining customer load as the total historical or anticipated annual energy usage, and in fact should not place any artificial restrictions on system size related to the NM/NB tariff – let the cash-out take care of that.
3. Allow customers the choice of cash-out date (January 1 or April 1 are good options, as our local REC currently offers). We understand the purpose of an annual cash-out, and agree with the

assumption that net metering/billing is meant as an opportunity for energy consumers to generate their own energy on an annual basis. The annual variability in solar production and in consumer usage however means that a fixed date 100% cash-out (all excess credits) creates an artificial system size limitation below total annual energy consumption.

4. Ensure the NM/NB tariff is open to all ownership arrangements without discrimination, including third party PPAs. Ensure the tariff remains available for the stated 20-year period including through potential ownership changes, and that “special provisions” and other aspects of the tariff are not more restrictive than the current net metering tariff.

We appreciate the opportunity to offer comments in this docket, and on this important policy issue.

Sincerely,

Harry Blobaum, Chair
Clayton County Energy District